



Ryan, Swanson & Cleveland, PLLC
1201 Third Avenue, Suite 3400
Seattle, WA 98101-3034
206.464.4224 | Fax: 206.583.0359
Tollfree: 1.800.458.5973
www.ryanswansonlaw.com

Jo M. Flannery
Attorney Of Counsel

direct dial 206.654.2241
flannery@ryanlaw.com
Ref. No. 2021687.01/015435.00010

October 24, 2019

Michelle Mullin, Project Manager
U.S. Environmental Protection Agency - Region 10
1200 Sixth Avenue, Suite 900, OCE-084
Seattle, WA 98101

Re: Rainier Commons Phase IIa Close-Out Report - Response to EPA's Request for Additional Information

Dear Ms. Mullin,

This letter provides the responses and additional information requested in connection with your review of the Rainier Commons IPWP Phase IIa Close-Out Report. EPA's October 15, 2019 comments are reproduced below, with the response to each immediately following.

1. **EPA Comment No. 1:**

General - Your report states that paint removal activities followed the documentation in the Work Plan and IPWP for Phase IIa, pursuant to the RBDA. For EPA to find that the conditions in the RBDA were met, Rainier needs to submit a narrative discussion of the removal process that occurred, particularly noting any deviances from the plan. Including details of the key operating parameters for media blasting and containment area and waste storage and disposal activities. For example, in the plan, Rainier stated that the waste disposal vendor would be "Emerald Services, or other similarly qualified waste disposal Contractor". The completion report should describe which vendor was used, among the other details requested above and in Condition 9 of the RBDA.

Response to Comment No. 1:

Phase IIa work conducted per the descriptions in the approved IPWP for Phase IIa.

The paint removal process consisted of a combination of abrasive blasting, followed by the use of hand tools, in this case small hand-held grinders, hammers and chisels. With the exception of minor finish work under the roof parapet flashing, all removal work was performed within the full negative air containment. (See Response to Comment No. 2 regarding the roof parapet flashing work).

Key operating parameters for all removal processes were results based. That is to say no prescribed setting or blasting pressure, nozzle size, distance from the wall, grinding disc size, chisel size or other such parameter was specified as mandatory, or tracked on an hourly or daily basis. As with Phase I, the primary operating parameter applied to all of the work was to adjust the removal technique and to repeat the removal technique as necessary, in each area, to achieve a result of 100 percent paint removal. The required result was monitored and confirmed first by the contractor and then confirmed by the independent inspections conducted by NVL, as well as Rainier Commons. The NVL visual clearance inspection report is included with the Phase IIa Close-Out Report at Exhibit 1.

Secondary parameters, such as minimizing damage to the underlying substrate (*e.g.* loss of mortar, brick surface) as a result of abatement work were considered but were found, at times, to be in conflict with the primary operating parameter, which was given priority. Persons performing the removal work were HAZWOPER certified and given discretion in determining equipment and operating parameters, within the scope of the approved IPWP, to best achieve 100 percent paint removal in each work area, as the adhesion and millage of the various layers of historical coatings naturally vary.

The general construction procedures submitted as part of the approved Phase IIa Individual Phased Work Plan (IPWP), Exhibit 6, pages 4 and 5 were utilized for the work, except that (as referenced in the Close-Out Report at paragraph 4) the building being constructed immediately to the south of Building 15 was utilized as the framework to establish the work platform, as well as the infrastructure to fabricate the Negative Pressure Enclosure (NPE). Supplement No. 2 to the approved IPWP IIa plan includes sketches of this revised NPE system in the section titled Interior Containment. It was followed during the work. Therefore, this was not a departure from the plan, but an approved part of the IPWP Phase IIa.

Interior protective measures were greatly enhanced during IPWP IIa operations. Each interior wall directly adjacent to walls being abated were covered from ceiling to floor with a layer of 6-mil plastic. A secondary interior barrier was then erected approximately 2-3 feet from the primary barrier, utilizing another layer of 6-mil plastic. A sketch of this protective assembly is also included in the Interior Containment section in Supplement No. 2 referenced above. It was followed during the work.

After construction, the NPE was fitted with the appropriate quantity of Negative Air Machines (NAM) to supply a minimum of 0.02 inches of negative differential air pressure. A three-stage decontamination unit was established at each NPE for both personnel and equipment use. Prior to the start of blasting operations, the NPE and interior protective measures were independently inspected and cleared for use by NVL Laboratories. A more detailed narrative description of the daily inspections are included in the daily field notes submitted with the Phase IIa Close-Out Report.

Upon completion of all abatement activities, waste transportation was arranged through Waste Management Inc. (Waste Management). Waste Management utilized a combination of trucks

and railcars, for each shipment, to transport and deliver the project waste to its final licensed disposal destination. The initial 12 supersacks were shipped to Columbia Ridge Landfill in Arlington, Oregon on August 9, 2016. On August 11, 2016 the second load consisting of 4 supersacks was shipped by the same carrier to the same final destination. The final shipment of two supersacks containing NPE and PPE gear and materials was shipped by Waste Management to the Arlington, Oregon facility on August 25, 2016.

Again, the daily field notes, included with and forming a part of the Phase IIa Close-Out Report, contain the more detailed narrative reporting on the work. All work was conducted in a manner that was protective of human health and the environment.

2. **EPA Comment No. 2:**

Visual Clearance- You note in Attachment 1- Final Visual Clearance, page 3 - that at the time of the inspection the paint located under parapet roof flashing remained because the containment was attached to this parapet and access to the paint was not possible. The report states that this paint would later be removed when the areas became accessible – i.e., when the containment was taken down by the Contractor and the parapet roof flashing could be lifted to provide access to the previously inaccessible area. Please clarify whether this paint was removed and disposed, and if the substrate was inspected.

Response to Comment No. 2:

Paint and First Layer of Substrate Under Parapet Cap Flashing Manually Removed - Visual Clearance, August 17, 2016.

Following completion of active blasting activities on August 4, 2016, the abatement contractor, CGI, set up a containment vessel to address the narrow strip of brick beneath the metal roof parapet cap flashing. The containment vessel was constructed along the southern parapet roof line of Building 15. The purpose of the containment vessel was to capture and retain any scrap pieces of brick material. The paint and the first layer of the brick substrate were manually removed from the building.

The removal was accomplished using manual labor and hand chisels. The outer layer of the brick substrate was physically chiseled off of the face of the brick, thereby removing by hand all paint and the first layer of the brick substrate from beneath the parapet flashing. PPE and HEPA-filtered vacuum systems were employed during this final hand-work (paint/brick surface removal) process. The results were inspected on August 17, 2016, where it was determined and verified that no visible paint remained. An additional copy of the August 17, 2016 Daily Field Notes is included here for ease of reference. The Field Notes also form a part of the original Phase IIa Close-Out Report (Reference Exhibit #8).

3. **EPA Comment No. 3:**

Concrete substrate sampling- The report identifies the concrete façade as a vertical element along the SW side of the south elevation of Building 15. However, the visual inspection photos show an apparent horizontal concrete element in grid 387, 340 and 356. Is this concrete, and if so, was this horizontal element sampled?

Response to Comment No. 3:

Concrete Substrate Area as Reported. Horizontal Element is Paint-Free Metal.

As stated in the background section of the NVL Report titled *CONCRETE - Post Visual Clearance – South Wall Building 15*, dated August 23, 2019, the only concrete substrate present in the IPWP IIa work area is as previously identified:

a small portion (approximately ½ of 1 percent of the entire elevation) of the wall area was revealed to be made of a concrete substrate. This strip of concrete measures approximately 16 inches wide, by 14 ½ feet long, or about 19 square feet in total.

As depicted in the photographs and diagrams included in the NVL Report, this small strip of concrete is located vertically, along the upper, western side of the wall.

In contrast, the horizontal, grey-colored band shown in the visual inspection photographs for grids 340, 356, and 387 is non-porous, galvanized steel flashing. The metal flashing runs along the length of the building, corresponding to the second-floor diaphragm inside the building. The flashing is presumed to have been installed during original construction.

All paint was removed from the metal flashing during the Phase IIa work. The metal flashing is shown in the photograph below. The photograph was taken on October 16, 2019.



4. **EPA Comment No 4:**

Waste disposal details

- a. You included sampling results and waste manifests for the spent blast media and PPE. The letter says that the blasting waste was stored in super sacks. Can you clarify that the blasting waste, including removed paint and blast media, has been disposed?
- b. The writing on the first manifests were too light to distinguish. Do you have a better copy to submit?

Response to Comment No. 4:

Waste Disposal.

As referenced above, Waste Management is the waste disposal vendor utilized for the Phase IIa work. All waste from Phase IIa was appropriately handled and disposed of at the Columbia Ridge Landfill, in Arlington, Oregon

As stated in Daily Field Notes, dated August 9 and 11, 2016 (additional courtesy copies attached), Waste Management was on-site on those dates, picking up a total of 16 Super-Sacks of blasting waste. The shipping manifests were included with each day's Field Notes, as well as in

Exhibit 5, pages 29 and 30 of the Phase IIa Close-Out Report. Block number 13 of the manifest identifies the shipment as “sandblast grit”. The waste is further identified on the manifests, in red lettering at the top of each page, as “Blasting Debris”. At the time of the blasting debris shipments, the entire NPE was still in place, pending NVL Laboratories’ clearance inspections. NPE and PPE were shipped under a separate waste profile, on August 25, 2016.

As to better copies of the waste manifests, unfortunately, the owner does not have a better copy of these manifests. The *Generator’s Shipper’s Initial Copy* of the transportation manifest is the last copy of a multi-part form. These copies are often light and unreadable. While the file copies retained at Rainier Commons are slightly better, they are faint and do not produce a clearer scanned image. Rainier Commons’ file copies are kept on site and available for inspection if desired.

We trust that this information fully addresses the four EPA comments to the Phase IIa Close-Out Report. We look forward to EPA’s approval of the Report.

Very truly yours,
RYAN, SWANSON & CLEVELAND, PLLC



Jo M. Flannery
Attorney Of Counsel

Enclosures

cc: Client
Lynne Davies, EPA Regional Counsel

Rainier Commons Exterior Paint Removal Project

Daily Observations & Activity Report

(Note Date, Report # and Page # on each sheet)

Date: 8-9-16

Daily Report #: PHASE 2

Notes on Daily Observations and Activities

- 1005 ARRIVED ON-SITE (PLUMBING PROBLEMS AT HOME.)
- 1005 MSN WEATHER - 61°, SSW 4 MPH, 82%, CLOUDY. NO EVIDENCE OF RAIN ACTIVITY OVERNIGHT.
- * 0540 YOUVALL PLACED PARTICULATE MONITORS AND AIR PUMPS IN POSITION FOR THE DAY.
- * 0600 CGI CREW - SAME AS YESTERDAY - CONTINUING TO USE DUSTERS AND HEPA VACUUMS, AS WELL AS DAMP RAGS TO CLEAN INSIDE NPE. NO DUST GENERATING PROCESS IN USE.
- * 0830 WASTE MANAGEMENT WAS ON SITE TO PICK-UP 12 SUPERSACK BOXES. MATERIAL TO BE SHIPPED TO COLUMBIA RIDGE LANDFILL, ARLINGTON OREGON. WASTE ACCEPTED USING CHARACTERISTIC PROFILE 115710 OR. LARRY MIDDALGH SIGNED FOR SHIPMENT. W/M WILL RETURN THURSDAY FOR REMAINING BOXES.
- 1015 OBSERVED CGI CLEANING ON LEVEL ONE. LARRY-
CGI, MIXING ENCAPSULANT/LOCKDOWN FOR →
INSPECTOR

Signature [Signature]

Date 8-9-16

Daily Observation / Activity Report (Version 1) (6-11-14)

Page 1 of 2

- Include reasons for non-satisfactory responses noted in Daily Inspection Checklist
- If referring to any item from Daily Inspection Checklist, give row #
- Submit Daily Inspection Checklist and Daily Observations/Activity Report along with sample submission and data sheets to NVL Labs

Rainier Commons Exterior Paint Removal Project

Daily Observations & Activity Report

(Note Date, Report # and Page # on each sheet)

Date: 8-11-16

Daily Report #:

PHASE 2

Notes on Daily Observations and Activities

- 0650 ARRIVED ON SITE. ENCLOSURE SECURE.
HAM MANOMETER = 0.037"
- 0700 MSN WEATHER - 61°, NE 2 MPH, 81%, SUNNY
- 0715 RECEIVED DRAFT LAB REPORT FROM NVL REGARDING
AIR SAMPLE FROM INSIDE NPE = NON-DETECT FOR
PCBS.
- 0830 NVL - DAVE & MUNAF - ARRIVED TO PERFORM 2%
CRITICAL INSPECTION. YOUNAL HELD 3 1/2' x 1'
TEMPLATE AT EACH RANDOMLY SELECTED
GRID LOCATION, WHILE DAVE & MUNAF
DOCUMENTED/ PHOTOGRAPHED CONDITION INSIDE
GRID.
- 0900 CGT HAD REMAINING FOUR 1 CY SUPERSACK
BOXES PICKED UP BY WASTE MANAGEMENT.
MANIFEST ATTACHED.
- 1040 NVL COMPLETED THEIR 2% CRITICAL
INSPECTION.
- 1045 PROVIDED NVL WITH COMPOSITE SAMPLE OF →
INSPECTOR

Signature

Date

8-11-16

Daily Observation / Activity Report (Version 1) (6-11-14)

Page 1 of 2

- Include reasons for non-satisfactory responses noted in Daily Inspection Checklist
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BLASTING DEBRIS - 1ST LOAD - 12 BOXES - 8/9/16

NON-HAZARDOUS WASTE MANIFEST		1. Generator ID Number		2. Page 1 of	3. Emergency Response Phone	4. Waste Tracking Number	
5. Generator's Name and Mailing Address				Generator's Site Address (if different than mailing address)			
Generator's Phone:							
6. Transporter 1 Company Name				U.S. EPA ID Number			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address				U.S. EPA ID Number			
Facility's Phone:							
GENERATOR	9. Waste Shipping Name and Description			10. Containers		11. Total Quantity	12. Unit Wt./Vol.
				No.	Type		
	1.			12			
	2.						
	3.						
4.							
13. Special Handling Instructions and Additional Information							
1. 1157100R - LFØ1 - SANDBLAST GRIT							
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.							
Generator's/Offlor's Printed/Typed Name				Signature		Month Day Year	
Middaugh						8 9 16	
TRANSPORTER	15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.				Port of entry/exit:		
	Transporter Signature (for exports only):				Date leaving U.S.:		
TRANSPORTER	16. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name				Signature		Month Day Year
Leonard J. Warnack						08 09 16	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
DESIGNATED FACILITY	17. Discrepancy						
	17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number:						
	17b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone:							
17c. Signature of Alternate Facility (or Generator)							
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a							
Printed/Typed Name				Signature		Month Day Year	

**NON-HAZARDOUS
WASTE MANIFEST**

BLASTING DEBRIS - 2ND LOAD - 4 BOXES - 8-11-16

1. Generator ID Number		2. Page 1 of	3. Emergency Response Phone	4. Waste Tracking Number	
5. Generator's Name and Mailing Address					
Generator's Site Address (if different than mailing address)					
Generator's Phone:				U.S. EPA ID Number	
6. Transporter 1 Company Name				U.S. EPA ID Number	
7. Transporter 2 Company Name				U.S. EPA ID Number	
8. Designated Facility Name and Site Address				U.S. EPA ID Number	
Facility's Phone:					
9. Waste Shipping Name and Description				10. Containers	
				No.	Type
1. <i>BLASTING DEBRIS</i>				4	
2.					
3.					
4.					
11. Total Quantity					
12. Unit Wt/Vol					
13. Special Handling Instructions and Additional Information					
<i>1. 1157NOR - LFDI SANDBLAST GRIT</i>					
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.					
Generator's/Officer's Printed/Typed Name				Signature	Month Day Year
<i>Larry Middelburg</i>					<i>8 11 16</i>
15. International Shipments		<input type="checkbox"/> Import to U.S.		<input type="checkbox"/> Export from U.S.	
Transporter Signature (for exports only):		Port of entry/exit:		Date leaving U.S.:	
16. Transporter Acknowledgment of Receipt of Materials		Signature		Month Day Year	
Transporter 1 Printed/Typed Name		<i>Leonard J. Wermach</i>		<i>08 11 16</i>	
Transporter 2 Printed/Typed Name		Signature		Month Day Year	
17. Discrepancy					
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
Manifest Reference Number:					
17b. Alternate Facility (or Generator)					
U.S. EPA ID Number					
Facility's Phone:					
17c. Signature of Alternate Facility (or Generator)					
Month Day Year					
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a					
Printed/Typed Name				Signature	Month Day Year

Rainier Commons Exterior Paint Removal Project

Daily Observations & Activity Report

(Note Date, Report # and Page # on each sheet)

Date: 8-17-16

Daily Report #: PHASE 2

Notes on Daily Observations and Activities

- 0650 ARRIVED ON SITE. CGI ALREADY ON SITE. SAME CREW AS YESTERDAY.
- 0710 MSN WEATHER - 63°, W 10MPH, 80%, MOSTLY SUNNY
- 0730 OBSERVED CGI CREW VACUUMING WALLS AND FLOORS IN BLDG 15-200. OBSERVED CGI CREW IN FULL TYVEK, FULL-FACE RESPIRATORS CHISELING OUT EXPANDABLE FOAM AND SLIVER OF BRICK UNDER PARAPET DRIP FLASHING. VERIFIED THAT WORK PERFORMED IS EFFECTIVE AND DOES NOT GENERATE DUST. HEPA-VAC USED ALONG WITH POLY COVER.
- 1035 CGI COMPLETED FINAL TOUCH-UP AND CLEANING. ALL CGI GEAR HAS BEEN LOADED-OUT. TWO BOXES OF POLY/PPE MAT'L AWAITING TRANSPORTATION.
- 1130 INSPECTION OF PAINT REMOVAL UNDER ROOF CAP COMPLETE. NO VISIBLE PAINT REMAINING.
- 1140 ^{SPRAYING} YOUNG PRIMER ON ROOF CAP AFTER SANDBLASTING
- 1245 JOSE/LUIS VACUUMING ROOF OF BLDG 15 HEPA-FILTERS

INSPECTOR

Signature [Signature]

Date 8-17-16

Daily Observation / Activity Report (Version 1) (6-11-14)

Page 1 of 1

- Include reasons for non-satisfactory responses noted in Daily Inspection Checklist
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- 1400 SITE RETURNED TO GENERAL CONTRACTOR.
- 1500 ADDITIONAL FIELD NOTES WILL BE ON AN "AS-NEEDED" BASIS